

# Exhibit A

**IN THE CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

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**SHENESHA N. HARDIN,**

**Plaintiff,**

**v.**

**Docket No. \_\_\_\_\_**

**Div. \_\_\_\_\_**

**JURY DEMANDED**

**JOHN DOE COMPANY,  
RODRICKUS DESHUN HUNT, and JOHN DOE 1-3**

**Defendants.**

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**COMPLAINT**

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The Plaintiff, Shenesha N. Hardin, appears now and hereby files this complaint against Defendants, Rodrickus Deshun Hunt, John Doe Company, and John Does 1-3. Shenesha N. Hardin seeks to recovery for personal injuries and damages incurred in a vehicle collision. In support of her prayer for relief, Shenesha N. Hardin respectfully states as follows:

**PARTIES**

- (1) Plaintiff Shenesha N. Hardin ("Plaintiff") is an adult resident of Shelby County, Tennessee.
- (2) Defendant John Doe Company is a corporation, entity, agency, business, and the like which are presently unknown to the Plaintiff but whose negligent acts and/or omissions may have proximately caused or contributed to Plaintiff's injuries. Plaintiff will amend this Complaint to allege the true capacity of these parties when they are ascertained.
- (3) Defendant Rodrickus Deshun Hunt, upon information and belief, is an adult resident of Batesville, Mississippi. Rodrickus Deshun Hunt can be served with process at 202 Butler Road, Batesville, Mississippi 38606.

- (1) That Defendants John Does 1-3 are corporations, entities, agencies, businesses, individuals, and the like which are presently unknown to the Plaintiff but whose negligent acts and/or omissions may have proximately caused or contributed to Plaintiff's injuries. Plaintiff will amend this Complaint to allege the true capacity of these parties when they are ascertained.

### **JURISDICTION AND VENUE**

- (2) This cause of action arises out of a motor vehicle collision that occurred in Shelby County, Tennessee on April 27, 2021. Venue and in personam jurisdiction over Defendants Rodrickus Deshun Hunt and John Doe Company properly situated in Shelby County.
- (3) As a court of general jurisdiction, this Court has subject matter jurisdiction over this matter pursuant to Tenn. Code Ann. § 16-10-101.

### **FACTS**

- (4) Upon information and belief, on the evening of Thursday, April 27, 2021, Plaintiff Shenesha N. Hardin was the owner and operator of a 2017 Ford Focus and was traveling westbound on Holmes Road in Memphis, Tennessee. Plaintiff approached the intersection of Holmes Road and Tchulahoma with a green turn signal indicating that she had the right-away to make a left turn on Tchulahoma.
- (5) At said time and location Defendant Rodrickus Deshun Hunt was operating a John Doe Company commercial vehicle and was acting as the agent, employee, and/or servant of John Doe Company, which was involved in the accident with the Plaintiff on April 27, 2021.

- (6) Upon information and belief, Defendant Rodrickus Deshun Hunt traveling eastbound on Holmes Road in Memphis, Tennessee. Defendant was approaching the intersection of Holmes Road and Tchulahoma and had a red traffic light. The Defendant failed to stop at the red light, entered the intersection, and caused his vehicle to collide with the Plaintiff's vehicle.
- (7) Upon information and belief, Mr. Hunt was not experiencing any mechanical issues but chose to park his vehicle in the warning flashers, no flashing signal lights, no flashing emergency lights, or signs posted outside of his vehicle to warn oncoming drivers of his vehicle.
- (8) Due to the Defendant Rodrickus Deshun Hunt negligent and reckless parking of his vehicle in the travel lane exiting the Memphis Airport with no warning flashers, no flashing signal lights, no flashing emergency lights, or signs posted outside of his vehicle to warn oncoming drivers of his vehicle, the Plaintiff did not see the unilluminated tractor sitting in the lane and crashed into the rear of the Defendants' vehicle.
- (9) At all relevant times, Plaintiff was operating her vehicle in a safe, cautious, and prudent manner, obeying all applicable rules and regulations of the roadway.
- (10) Plaintiff did not have an opportunity to avoid the collision and, as a direct and proximate result of the hereinafter described negligent acts of Defendants John Doe Company and Rodrickus Deshun Hunt, he sustained personal injuries and other damages to be more particularly described hereinafter.

**CAUSES OF ACTION Count I: NEGLIGENCE**

- (11) Plaintiff reasserts and incorporates by reference all allegations made elsewhere in this Complaint.

- (12) At all relevant times, Defendants Rodrickus Deshun Hunt and John Doe Company owed a duty to exercise reasonable care in the operation of his motor vehicle.
- (13) Upon information and belief, Plaintiff alleges that on or about April 27, 2021, Defendant, Rodrickus Deshun Hunt, was operating the above-referenced commercial vehicle with flatbed, as the agent, servant and/or employee of Defendants John Doe Company and/or John Does 1-3. Thus, Plaintiff relies upon the doctrines of respondeat superior and agency, alleging that any negligence on the part of Defendant, Rodrickus Deshun Hunt, should be imputed to Defendants John Doe Company, and/or John Does 1-3.
- (14) Plaintiff charges and alleges that Defendant, Rodrickus Deshun Hunt, is guilty of the following acts and/or omissions of common law negligence, which were a direct and proximate cause of Plaintiff's injuries and resulting damages to wit:
- i. In negligently failing to use that degree of care and caution in the operation of his commercial vehicle as was required of a reasonable and prudent person under the same or similar circumstances existing at the time and place of the aforementioned collision;
  - ii. In negligently failing to devote full time and attention to the operation of his commercial vehicle;
  - iii. Failing to see what was there to be seen;
  - iv. Impeding the normal and reasonable movement of traffic;
  - v. Other acts and/or omissions to be shown at the trial of this cause.
- (15) Defendants Rodrickus Deshun Hunt and John Doe Company's breach of duty was the direct and proximate cause of the injuries and damages suffered by Plaintiff Shenesha N. Hardin.

**Count II: Negligence Per Se**

- (16) Plaintiff reasserts and incorporates by reference all allegations made elsewhere in this Complaint.
- (17) At all relevant times the following statutes of the State of Tennessee and ordinances of the City of Memphis were in full force and effect:
- (a) Tenn. Code Ann. §55-8-136. Due care
  - (b) Tenn. Code Ann. §55-10-205. Reckless driving
- (18) Upon information and belief, Defendants are the registered owner of the commercial vehicle involved in this wreck and is therefore responsible for the acts of the driver of that vehicle.

**NEGLIGENT ENTRUSTMENT**

- (19) Plaintiff incorporates paragraphs 1 through 18 as if restated here verbatim.
- (20) Plaintiff alleges, upon information and belief, that Defendants, John Doe Company, and/or John Does 1-3, knew, or in the exercise of due diligence and reasonable inquiry, should have known of Defendant Rodrickus Deshun Hunt's propensity and proclivity to drive in an illegal, unlawful, negligent and/or reckless manner.
- (21) Plaintiff alleges that Defendants, John Doe Company, and/or John Does 1-3, is guilty of the following acts and/or omissions of common law negligence, which were a direct and proximate cause of Plaintiff's injuries and resulting damages, to wit:
- (a) Negligent entrustment of the subject vehicle to Defendant, Rodrickus Deshun Hunt;
  - (b) Other acts and/or omissions to be shown at the trial of this cause.

**DAMAGES AND INJURIES**

- (22) Plaintiff reasserts and incorporates by reference all allegations made elsewhere in this Complaint.
- (23) As a direct and proximate result of the above-described breaches and violations of the common law and the statutes of Tennessee by Defendants, Plaintiff have suffered injuries and damages, including but not limited to:
- A. Serious and painful physical injuries;
  - B. Past, present, and future physical and emotional pain and suffering;
  - C. Past, present, and future mental anguish and emotional distress;
  - D. Past, present, and future lost wages;
  - E. Past, present, and future medical expenses;
  - F. Temporary and permanent impairment and disability;
  - G. Certain other reasonable and necessary healthcare expenses, prescription expenses, certain transportation expenses to and from healthcare providers, and other out-of-pocket expenses,
  - H. Loss of quality and enjoyment of the normal pleasures of life, past, present, and future;
  - I. Loss of future earning capacity;
  - J. Inconvenience; and
  - K. Other damages to be proven at trial.

**PRAYER FOR RELIEF**


**WHEREFORE, PREMISES CONSIDERED**, Plaintiffs respectfully sues Defendants, Rodrickus Deshun Hunt, John Doe Company, and John Does 1-3 for a reasonable amount of restitution and compensation for damages the sum of FIVE HJNDRED THOUSAND DOLLARS (\$500,000.00) for the Defendants' actions.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiffs respectfully pray for damages as they may appear on the trial of this cause, reserving the right to amend this pleading to conform to the facts as they may develop, for cost and interest, Pre-judgment and Post-judgment interest, and for all other general relief justified by the facts under the law or equity. Plaintiffs respectfully pray for damages as they may appear on the trial of this cause reserving the right to amend this pleading to conform to the facts as they may develop.

Respectfully submitted,

**REAVES LAW FIRM, PLLC**

By:

  
**James R. Davis, Jr. (TN Bar #37113)**  
1991 Corporate Ave., Suite 310  
Memphis, TN 38132

Tel: (901) 623-8685  
Fax: (901) 567-8731  
Email: james.davis@beyourvoice.com  
*Attorney for Plaintiff Shenesha N. Hardin*



(CIRCUIT/CHANCERY) COURT OF TENNESSEE  
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED  
2022 Feb 11 2:13 PM  
CLERK OF COURT

## SUMMONS IN CIVIL ACTION

☒ Lawsuit  
☐ Divorce

Docket No. \_\_\_\_\_

Ad Damnum \$ \_\_\_\_\_

Shenesha Hardin

John Doe Company,  
Rodrickus Deshun Hunt, and John Does 1-3

VS

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

Rodrickus Deshun Hunt  
202 Butler Road  
Batesville, MS 38606

Method of Service:

- ☐
- Certified Mail
- 
- ☐
- Shelby County Sheriff
- 
- ☐
- Commissioner of Insurance (\$)
- 
- ☐
- Secretary of State (\$)
- 
- ☐
- Other TN County Sheriff (\$)
- 
- ☒
- Private Process Server
- 
- ☐
- Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on James Davis

Plaintiff's

attorney, whose address is 1991 Corporate Avenue, Suite 310, Memphis, TN 38132

telephone 901-417-7166

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED \_\_\_\_\_ By \_\_\_\_\_, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20\_\_

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: \_\_\_\_\_, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons  
and a copy of the Complaint to the following Defendant \_\_\_\_\_  
at \_\_\_\_\_

\_\_\_\_\_  
Signature of person accepting service

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant \_\_\_\_\_  
because \_\_\_\_\_ is (are) not to be found in this County after diligent search and inquiry for the following  
reason(s): \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process



**The Shelby County, Tennessee Circuit Court**

**Case Style:** SHENESHA HARDIN VS JOHN DOE COMPANY

**Case Number:** CT-0560-22

**Type:** SUMMONS ISSD TO MISC

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David Smith, DC

Electronically signed on 02/11/2022 03:35:56 PM

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VS

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Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

John Does 1-3

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